

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**JIANGSU HUARI WEBBING
LEATHER CO., LTD.,**

Plaintiff,

Case No. 23-cv-2605

**v.
JOES IDENTIFIED IN
SCHEDULE “A”,**

Defendants.

**DECLARATION OF LEE ACKERMAN IN SUPPORT OF MOTION TO DISSOLVE
TEMPORARY INJUNCTION AND PREVENT ENTRY OF PERMANENT
INJUNCTION**

Lee Ackerman, being duly sworn, declares the following to be true under the penalty of perjury:


1. I am a member of Defendant # 62 -Trailblaze Products (“Defendant”) and I make this Declaration in support of the motion to dissolve temporary injunction and prevent the entry of a permanent injunction. Everything stated herein is true and I would testify in conformity herewith if called to do so in person.
2. I received no notice of the hearing on the temporary injunction set by Plaintiff. I only learned about this issue from Amazon on April 11, 2023 after my accounts were frozen and my listing removed. I also just learned of the hearing set for Monday, April 17th.
3. Defendant has no connections to New York, no residence, no business, no employees and no bank accounts. The store we operate on amazon is called Trailblaze Products and the harm that Plaintiff is doing to us on that particular platform is the subject of this lawsuit.

4. Plaintiff has grouped all Defendants and claimed we are selling items with an ASIN number B07KSDSSS1 that infringe. However, our product is a product we purchased directly from Plaintiff for resale prior to the patent being obtained.

5. We currently have approximately \$11,000 frozen, and rising, for a product that is 30% of our sales.

6. We are a United Kingdom company in existence since 2015 with a perfect 5.0 rating on Amazon.

Dated: April 15, 2023

A handwritten signature in black ink, appearing to read 'Lee Ackerman', written over a horizontal line.

Lee Ackerman